

AO 91 (Rev. 01/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the  
Western District of Texas

United States of America

v.

JEFFREY TUCKER

*Defendant*

Case No. SA15-MJ-785

Filed  
09/16/15  
Clerk, U. S. District Court  
Western District of Texas  
By *MAH*  
Deputy

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 9-7-15 in the county of Bexar in the Western District of  
Texas, the defendant violated 18 U. S. C. § 2252A(a)(2), an offense described as follows:

Receipt of Child Pornography

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

*Larry Baker*  
Complainant's signature

Larry Baker, Special Agent, FBI  
Printed name and title

Sworn to before me and signed in my presence.

Date: September 16, 2015

*John W. Primomo*  
Judge's signature

City and state: San Antonio, Texas

John W. Primomo, US Magistrate Judge  
Printed name and title

Penalties: 20 years imprisonment; \$250,000 fine; lifetime supervised release; \$100 special assessment,  
and restitution.

### **AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Larry Baker, the Affiant herein, first being duly sworn, do state as follows:


1. Your Affiant is employed as a Special Agent with the Federal Bureau of Investigation (FBI) in San Antonio, Texas. Your Affiant has been a Special Agent with the FBI since January, 1999. Your Affiant's experiences as a Special Agent include, but are not limited to, conducting investigations, executing arrest warrants, executing search warrants, collection of evidence, interviewing of witnesses, use of force, firearms and other law enforcement related topics. Your Affiant is currently assigned to the FBI Cyber Crimes Unit, where he conducts investigations relating to violations of the laws of the United States as they relate to computer-related crimes.
2. The factual information supplied in this affidavit is based upon your Affiant's own investigation as well as information provided by other law enforcement officers. Since this affidavit is submitted for the purpose of securing an arrest warrant, it does not include every fact known to me concerning this investigation. I have set forth facts that I believe establish probable cause to believe that Jeffrey Tucker, date of birth August 7, 1984, has violated the provisions of Title 18, United States Code, Section 2252A(a)(2).
3. The San Antonio Division of the FBI received information that an individual using an IP address in San Antonio, Texas, was logging into a particular website on multiple occasions between January and March of 2015, to access files depicting the sexual abuse and exploitation of children. One of the images depicted a nude female toddler with her legs spread apart and an adult female holding a sex toy near the vagina of the toddler.
4. On September 16, 2015, FBI agents executed a search warrant at the home of JEFFREY TUCKER and seized digital devices. Affiant interviewed TUCKER during the execution of a federal search warrant at TUCKER's residence. TUCKER advised Affiant that he has utilized the Internet for the past 10 to 15 years in order to view and download child pornography images and videos. TUCKER is presently utilizing a computer system, and the associated Internet service, located at his residence in San Antonio, Texas, to view images of child pornography and to download videos of child pornography. TUCKER stores child pornography videos on the

hard drive housed in this computer system. TUCKER masturbates to these child pornography videos.

5. TUCKER agreed to take a polygraph examination and was transported from his residence to the FBI office in San Antonio. TUCKER told agents the investigation has ruined his life and he wanted to commit suicide. TUCKER also told agents that he wanted to be arrested. He stated he had nothing to lose and therefore if not arrested, he may act on his fantasies regarding sexually abusing a child.

6. A forensic preview of TUCKER's computer was conducted and revealed files depicting children engaged in sexually explicit conduct. One video received on or about September 7, 2015, depicts a minor female, approximately five years old, being anally penetrated by an adult male penis. The video depicts the child having a thermometer inserted in her vagina and then in her anus. Later in the video, the adult male ejaculates onto the minor child.

7. Based on the aforementioned facts, your affiant respectfully submits that there is probable cause to believe that JEFFREY TUCKER, knowingly received any child pornography or any material that contains child pornography, as defined in 18 U.S.C. § 2256(8), that has been mailed, or using any means or facility of interstate or foreign commerce shipped or transported in or affecting interstate or foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2252A(a)(2).

  
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Larry Baker, Special Agent  
Federal Bureau of Investigation

Sworn to and subscribed before me this 16<sup>th</sup> day of September, 2015.

  
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JOHN W. PRIMOMO  
U.S. MAGISTRATE JUDGE